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prior art references, when combined, must teach or suggest all of the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure (MPEP 2142). The prior art must suggest the desirability of the claimed invention (MPEP 2143.01).

Applicant asserts there is absolutely no disclosure in DeLorme of sorting according to proximity of a related zone of data records in relation to a position of a user, as recited in independent claims 1 and 23. In fact, the Office Action admits DeLorme does not explicitly teach sorting according to proximity of a related zone of data records in relation to the position of a user. Furthermore, no reference is supplied that teaches this missing limitation.

There is absolutely no disclosure in DeLorme of sorting according to proximity of a related zone of data records in relation to the position of a user. As required by MPEP 2142, the prior art references, when combined, must teach or suggest all of the claim limitations. DeLorme does not teach or suggest the claimed feature of sorting according to proximity of a related zone of data records in relation to the position of a user. In fact, the Office Action admits this feature is not taught. Furthermore, the Office Action fails to provide a reference that teaches this feature. Thus, the prior art references fail to teach or suggest all of the claim features.

Additionally, DeLorme teaches away from sorting according to proximity of a related zone of data records in relation to the position of a user. In particular, as admitted by the Office Action, the user must return to the IRMIS system to modify the route or travel plan output. Accordingly, the user must leave a "zone" to sort the route or travel plan. Thus, records are not sorted according to a relation to a position of a user because the user must leave a zone to sort the records.

Furthermore, the Office Action alleges various methods for database searching and sorting are well known in the art of computer programming. However, Applicants have found no teaching of such a statement in DeLorme. Furthermore, the Office Action does not specify how such methods amount to sorting according to proximity of a related zone of data records in relation to the position of a user. If the Office Action is implying such is well known, Applicants traverse this assertion and request documentary evidence to support such an assertion in accordance with MPEP 2144.03. In particular, there is no basis for the allegation that sorting

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according to proximity of a related zone of data records in relation to the position of a user is well known.

Also, there is absolutely no motivation to perform sorting according to proximity of a related zone of data records in relation to a position of a user. Such motivation is not present in the cited reference and such is not well known. If the Office Action is alleging that such is well known, Applicants traverse this assertion and request documentary evidence to support such an assertion in accordance with MPEP 2144.03.

The Office Action also rejects, under 35 U.S.C. § 103, claims 9-18 over Stilp et al. (U.S. Patent No. 6,159,465) and Wakabayashi et al. (U.S. Patent No. 5,794,222). These rejections are respectfully traversed.

Applicants assert there is no motivation to combine Stilp et al. with Wakabayashi et al. The Office Action alleges such motivation is based on col. 2, lines 18-22. However, these statements only amount to the detection of fraud in a mail processing system. This does not amount to motivation to combine the teachings of Wakabayashi et al. with Stilp et al. In particular, Stilp et al. is directed to a wireless location system such as one used for E-911 calls (col. 1, lines 15-23, col. 4, lines 26-37). There is absolutely no disclosure of a mail processing system in Stilp et al. Thus, the disclosure of detecting fraud in a mail processing system in Wakabayashi et al. does not amount to motivation to combine teachings with a wireless location system in Stilp et al. Therefore, there is no motivation to combine the teachings of Wakabayashi et al. with Stilp et al.

Thus, Applicants respectfully submit that independent claims 1, 9, and 23 define patentable subject matter. The remaining claims depend from the independent claims and therefore also define patentable subject matter. Accordingly, Applicants respectfully request the withdrawal of the rejections under 35 U.S.C. § 103.

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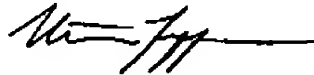
CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully submit this application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-24 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

The Commissioner is hereby authorized to deduct any fees arising as a result of this Amendment or any other communication from or to credit any overpayments to Deposit Account No. 50-2117.

Respectfully submitted,



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Dated: November 21, 2003

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